

### REMARKS

Claims 7-12 stand objected to because of inconsistent use of the terms “accessibility” and “accessability.” The claims have been amended to correct this inconsistency. The purpose of the amendment is to correct a typographical mistake and no substantive change is intended by this amendment. Withdrawal of the objection with respect to the claims as amended is respectfully requested.

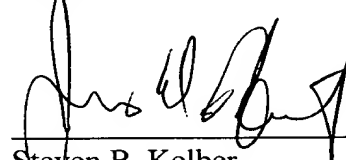
Claims 7-12 are objected to because of use of the term “which is mostly likely the threat” appearing in Claim 7. Claim 7 has been amended to correct this typographical error. No substantive change is intended by this amendment. Withdrawal of the objection with respect to the claims as amended is respectfully requested.

Claims 1-12 stand rejected under 35 U.S.C. §103 over Vaetch in combination with one or more other references. This rejection is traversed. With respect to independent Claims 1 and 7, the office action relies on Vaetch as teaching the calculation of a risk based at least partially on the accessibility of a site and the probability that a terrorist attack will occur. 10/24/02 Office Action at 4. Submitted herewith is an affidavit pursuant to 3 C.F.R. § 1.131 from named inventors establishing that they had conceived of this element of the claimed invention in the United States prior to the date of the Vaetch reference, namely October 5, 1999, and that the inventors worked diligently in the United States to reduce the claimed invention to practice from a date prior to the Vaetch reference until the filing of the present application on December 3, 1999. Therefore, applicants respectfully submit that the Vaetch reference has been antedated and respectfully request withdrawal of the rejection.

In view of the foregoing remarks, all claims are believed to be in condition for immediate allowance. Allowance of the application is respectfully solicited.

Respectfully submitted,

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**MARKED-UP COPY OF AMENDED CLAIMS**

1. (Amended) An apparatus for assessing a risk of a terrorist attack comprising:  
  
a memory;  
  
an input device;  
  
a display device; and  
  
a processor connected to the memory, the input device and the display device, the processor being configured to perform the steps of:  
  
inputting information about a site of potential terrorist attack from a user;  
  
constructing a model of the site based on the information input from the user;  
  
accepting a designation from the user of a weapon and delivery point at the site;  
  
determining an [accessability] accessibility of the site to the weapon/delivery point  
by determining a threat vector which is mostly likely the threat vector by which the weapon will  
be delivered and the likelihood of a successful delivery based on the model;  
  
determining a probability that a terrorist attack will occur; and  
  
calculating a risk based at least partially on the accessibility and probability.
4. (Amended) The apparatus of Claim 1, wherein the processor is further configured to  
perform the step of preparing a report including the probability, [accessability] accessibility and  
risk.  
  
determining a probability that a terrorist attack will occur; and  
  
calculating a risk based at least partially on the accessibility and probability.

7. (Amended) A method for assessing a risk of a terrorist attack comprising the steps of:  
inputting information about a site of a potential terrorist attack from a user;  
constructing a model of the site based on the input from the user;  
accepting a designation from the user of a weapon and delivery point at the site;  
determining an [accessability] accessibility of the site [to the weapon/delivery point] by  
determining a threat vector which is [mostly] a most likely [the] threat vector by which the  
weapon will be delivered and the likelihood of a successful delivery based on the model;  
determining a probability that a terrorist attack will occur; and  
calculating a risk based at least partially on the accessibility and probability.

10. (Amended) The method of Claim 7, wherein the processor is further configured to  
perform the step of preparing a report including the probability, [accessability] accessibility and  
risk.